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VIA ECF

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/18/2020

18 February 2020

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Gabbard v. Clinton*, Case No. 1:20-cv-00558: Joint request for adjournment of March 6, 2020 pretrial conference

Dear Judge Caproni:

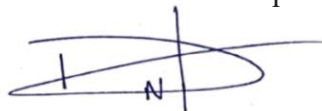
Plaintiffs Tulsi Gabbard and Tulsi Now, Inc. (collectively, "Gabbard") and Defendant Hillary Clinton jointly write to request the adjournment of the March 6, 2020 pretrial conference. The reason for the requested adjournment is that Clinton's response to the complaint is due March 30, 2020. (Gabbard effected service on January 30, 2020, via obtaining Clinton's waiver of the service summons. (ECF No. 8.))

Clinton intends to respond to the complaint with a motion to dismiss. Gabbard and Clinton believe that a pretrial conference would be more effective if held after Clinton's motion to dismiss is both on file and fully briefed before the Court. Gabbard and Clinton expect the motion to dismiss to be fully briefed by April 20, 2020. They therefore propose pretrial conference dates of May 1 or 8, 2020.

If the Court grants the adjournment of the March 6 pretrial conference to one of these dates, Gabbard and Clinton also request that the Court adjourn the deadline to submit their joint letter describing the case and proposed case management plan to one week before the new pretrial conference date.

This is the first request for adjournment.

Respectfully submitted,



Dan Terzian
Counsel for Gabbard



Katherine Turner
Counsel for Clinton

Application GRANTED. The initial pretrial conference is adjourned to **May 1, 2020 at 10:00 a.m.** The parties' joint letter and proposed case management plan is due by **April 23, 2020.**

SO ORDERED.



2/18/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE